

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

ALI KARIMI, Individually and On Behalf of All
Others Similarly Situated,

Plaintiff,

v.

DEUTSCHE BANK AKTIENGESELLSCHAFT,
JOHN CRYAN, CHRISTIAN SEWING, and
JAMES VON MOLTKE,

Defendants.

No. 2:20-CV-08978-ES-MAH

STIPULATION FOR EXTENSION OF
FILING OF THE SECOND AMENDED
COMPLAINT AND MOTION TO
DISMISS BRIEFING SCHEDULE

On December 28, 2020, Judge McNulty appointed plaintiff Yun Wang as Lead Plaintiff (“Lead Plaintiff”) and his attorneys, Pomerantz LLP, as Lead Counsel in the above-referenced action. ECF No. 31. Judge Salas, the presiding judge over the action, referred Wang’s motion for appointment as Lead Plaintiff and for his attorneys as Lead Counsel to Judge McNulty.

Pursuant to Local Rule 6.1(a), Lead Plaintiff and Defendants Deutsche Bank Aktiengesellschaft, John Cryan, Christian Sewing, and James Von Moltke (“Defendants”), by and through their respective undersigned counsel, hereby stipulate and agree that, with the Court’s approval, the deadline for Lead Plaintiff to file the Second Amended Complaint shall be March 1, 2021; the deadline for Defendants to answer, plead, move, or otherwise respond to the amended complaint shall be April 15, 2021; the deadline for Lead Plaintiff to file any opposition to the motion to dismiss shall be June 1, 2021; and the deadline for Defendants to file a reply shall be July 1, 2021.

Under the Court’s Order dated August 3, 2020, Lead Plaintiff’s amended complaint is currently due on January 27, 2021 (*i.e.*, within 30 days after the Court’s appointment of Lead

Plaintiff and Lead Counsel), ECF No. 15. The Order also directs Defendants to move, answer, or otherwise respond to the amended complaint within 30 days after that complaint is filed, and, if Defendants move to dismiss that complaint, Lead Plaintiff's opposition is due within 30 days of the motion and Defendants' reply is due 15 days thereafter. The extension of the filing of the Second Amended Complaint and motion to dismiss briefing schedule sought, is requested in light of the intervening holidays and to appropriately research and brief complex issues of securities laws. This Court granted similar requests in the past. *See, e.g., Angela Fuller v. Avis Budget Car Rental LLC, and Avis Budget Group, Inc.*, No. 15-CV-3856-KM-MAH, So Ordered Stipulation for Extension of Briefing on Defendants Motion for Judgment on the Pleadings (D.N.J. Nov. 23, 2015), ECF No. 26 (granting a one-month extension due to "the intervening holidays" and to "provide time for the Parties to provide complete arguments on the Motion").

Dated: December 30, 2020

Respectfully submitted,

POMERANTZ LLP

/s/ Emma Gilmore

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*Counsel for Defendants Deutsche Bank
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SO ORDERED.

DATED: January 4, 2021

/s/ Kevin McNulty

HON. KEVIN MCNULTY
UNITED STATES DISTRICT JUDGE